

1 ERIC GRANT  
2 United States Attorney  
3 JAMES R. CONOLLY  
4 Assistant United States Attorney  
5 501 I Street, Suite 10-100  
6 Sacramento, CA 95814  
7 Telephone: (916) 554-2700  
8 Facsimile: (916) 554-2900

9  
10  
11 Attorneys for Plaintiff  
12 United States of America

13  
14  
15 IN THE UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17  
18 UNITED STATES OF AMERICA,

CASE NO. 2:22-CR-147-WBS

19 Plaintiff,

v.

20 SARAH ANDERSON,  
21 FABIAN GOMEZ,  
22 WILLIAM OWEN,  
23 JOALEEN ROGERS,  
24 Defendants.

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

25 DATE: October 27, 2025  
TIME: 10:00 a.m.  
COURT: Hon. William B. Shubb

26  
27  
28 STIPULATION

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. This case is set for a status conference on October 27, 2025.

32 2. By this stipulation, defendants<sup>1</sup> now move to continue the status conference until

33 **January 12, 2026 at 10:00 a.m.**, and to exclude time between October 27, 2025, and January 12, 2026,  
34 under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

35  
36  
37  
38 <sup>1</sup> Defendants Wendy Labuda and Epifanio Ramirez do not join in this stipulation. Wendy  
39 Labuda entered a guilty plea on July 21, 2025 (ECF No. 181). Epifanio Ramirez entered an open plea to  
40 three of the four counts with which he is charged. ECF No. 195. The Court set a trial date of December  
41 9, 2025, for the remaining count, for Mr. Ramirez only. ECF No. 198

1       3.     The parties agree and stipulate, and request that the Court find the following:

2           a)     The government has produced discovery in this matter, consisting of over 1,300  
3     pages of investigative reports and photographs, including arrest reports, DEA reports, and other  
4     supporting documents. The government has also made available to the defense for viewing at the  
5     U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple  
6     controlled drug buys in the underlying investigation.

7           b)     Defense counsel desire additional time to conduct investigation into the charges,  
8     the alleged roles of their respective clients, and to review discovery in this case, including  
9     watching the video evidence the government has made available. Defense counsel will need  
10    additional time to discuss potential resolutions with their clients, prepare pretrial motions, and  
11    otherwise prepare for trial.

12          c)     In addition, defense counsel Philippa Lauben has recently substituted in as  
13    counsel for Sarah Anderson. She will need additional time to get up to speed on this matter and  
14    to discuss the case with her client.

15          d)     Counsel for defendants believe that failure to grant the above-requested  
16    continuance would deny them the reasonable time necessary for effective preparation, taking into  
17    account the exercise of due diligence.

18          e)     The government does not object to the continuance.

19          f)     Based on the above-stated findings, the ends of justice served by continuing the  
20    case as requested outweigh the interest of the public and the defendant in a trial within the  
21    original date prescribed by the Speedy Trial Act.

22          g)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
23    et seq., within which trial must commence, the time period of October 27, 2025 to January 12,  
24    2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
25    T4] because it results from a continuance granted by the Court at defendant's request on the basis  
26    of the Court's finding that the ends of justice served by taking such action outweigh the best  
27    interest of the public and the defendant in a speedy trial.

28        ///

1       4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
3 must commence.

4       IT IS SO STIPULATED.

5       Dated: October 22, 2025

ERIC GRANT  
United States Attorney

6       \_\_\_\_\_  
7       /s/ **JAMES R. CONOLLY**  
8       JAMES R. CONOLLY  
9       Assistant United States Attorney

10       Dated: October 22, 2025

11       \_\_\_\_\_  
12       /s/ **PHILIPPA LAUBEN**  
13       PHILIPPA LAUBEN  
14       Counsel for Defendant  
15       SARAH ANDERSON

16       Dated: October 22, 2025

17       \_\_\_\_\_  
18       /s/ **DAVID D. FISCHER**  
19       DAVID D. FISCHER  
20       Counsel for Defendant  
21       FABIAN GOMEZ

22       Dated: October 22, 2025

23       \_\_\_\_\_  
24       /s/ **JOHN R. MANNING**  
25       JOHN R. MANNING  
26       Counsel for Defendant  
27       WILLIAM OWEN

28       Dated: October 22, 2025

29       \_\_\_\_\_  
30       /s/ **TAMARA SOLOMAN**  
31       TAMARA SOLOMAN  
32       Counsel for Defendant  
33       JOALEEN ROGERS

34       **ORDER**

35       IT IS SO FOUND AND ORDERED.

36       Dated: October 27, 2025



37       \_\_\_\_\_  
38       **WILLIAM B. SHUBB**  
39       UNITED STATES DISTRICT JUDGE